

# EXHIBIT “B”

EVERLYN CINTRON  
2/14/2023

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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EVELYN CINTRON,	:	
	:	19-CV-4078
Plaintiff	:	
	:	
-VS-	:	
	:	
CITY OF PHILADELPHIA,	:	
	:	
Defendant	:	

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\* \* \* \* \*

TUESDAY, FEBRUARY 14, 2023

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Videotape deposition of EVELYN CINTRON, was taken at the law offices of Mincey, Fitzpatrick, Ross, 1650 Liberty Place, Philadelphia, Pennsylvania, before Renee Schumann, a Notary Public of the State of New Jersey and Notary Public of the Commonwealth of Pennsylvania, on the above date, commencing at 10:13 a.m.

1 THE COURT REPORTER: She was cutting  
2 out. I just wanted to make sure I got it. Go  
3 ahead, ma'am, finish.

4 THE WITNESS: Because Ted Qualli was  
5 having these problems with the officers, I put  
6 out a memorandum, a commander's order that  
7 they were not allowed to go in their pocket.  
8 Basically reiterating what the PAL policy  
9 stated.

10 BY MR. GOLDEN:

11 Q. We have -- during the deposition you've  
12 referred to both police officers and civilian staff  
13 and just -- this helps when the lawyers are looking  
14 at this later, you know, being consistent in the  
15 transcript, when you testify or refer to civilian  
16 staff, you are referring to PAL employees; is that  
17 correct?

18 A. Yeah.

19 Q. Okay. Did any of the PAL employees  
20 have the ability to set your schedule?

21 A. No.

22 Q. Did any of the PAL employees have the  
23 ability to discipline or reprimand you?

24 A. No.